

# **EXHIBIT 25**

## Platforms program policies

When you agree to the terms of Google's platform products, including Authorized Buyers, Campaign Manager, Google Ad Manager 360, Google Ad Manager, Search Ads 360, and Display & Video 360, you are required to adhere to the following policies (in addition to applicable partner and product-specific policies that Google makes available to you). If you fail to comply with these policies, we may suspend and/or terminate your account or particular ads.

### Content guidelines

Google's platform products must not be used in connection with content that is illegal, promotes illegal activity or infringes on the legal rights of others. This includes, for example, advertisements, the pages that display them, their landing pages, as well as pages that otherwise contain tags provided by Google's platform products. In the event that we receive a complaint, we reserve the right to disclose your identity to that complainant.

If you use Google's platform products in connection with content that is directed at children under the age of 13 years, you must notify Google using our [Search console](#) or tag your site, app, or ad request for child-directed treatment.

You must disclose clearly any data collection, sharing and usage that takes place on any site, app, email publication or other property as a consequence of your use of Google products. To comply with this disclosure obligation with respect to Google's use of data, you have the option to display a prominent link to [How Google uses information from sites or apps that use our services](#).

You must not use advertising creatives or monetize destinations that contain [abusive experiences](#).

### Invalid activity

- You must not set a cookie on Google's domains or modify, intercept or delete cookies set on Google's domains.
- You must not use artificial means to inflate impressions, conversions and/or clicks (e.g. click fraud).
- You must not distribute, or link to pages that distribute, malware or other software that violates Google's [Unwanted Software Policy](#).
- You must not use device fingerprints or locally shared objects (e.g. Flash cookies, Browser Helper Objects, HTML5 local storage) other than HTTP cookies, or user-resettable mobile device identifiers designed for use in advertising, in connection with Google's platform products.
- You must not use systems that overlay ad space on a given site without express permission of the site owner.

### Personalized advertising

You must not use Google's platform products to select or target interest-based advertisements, or to collect or use audience data such as cookie lists, based on:

- past or current activity by users known by you to be under the age of 13 years;
- past or current activity by users on sites or apps or areas of sites or apps directed at children under the age of 13 years;
- past or current activity by users on adult, gambling, or government agency sites or apps; or
- other inferred or actual sensitive information, including, without limitation:
  - health or medical history or information, such as from sites or apps that market to a specific health-related group,
  - negative financial status or other detailed information pertaining to a person's finances, such as information indicating that a user has a low credit rating or high debt load,
  - racial or ethnic origins, such as from sites or apps that collect affirmative racial or ethnic identification from visitors,
  - religious beliefs or other beliefs of a similar nature, such as from sites or apps that collect people's affirmative information on religion or religious beliefs,
  - the commission or alleged commission of any crime, such as information indicating that a user has a criminal record,
  - political affiliation, such as information indicating a user's political opinion or political ideology,
  - trade union membership, such as a user's visit to a trade union's site or app, or
  - sexual behavior or orientation, such as sexual orientation inferred from a user's visit to a particular site.

If you use Google's platform products for interest-based advertising:

- you must have all rights necessary to use audience data such as cookie lists.

- advertisers must attach notices to advertisements to make clear that they are interest-based (e.g. by using an "Ad Choices" icon); and
- all parties must comply with applicable Internet advertising industry guidelines (e.g. the Self-Regulatory Principles for Online Behavioral Advertising of the Digital Advertising Alliance, or IAB Europe's EU Framework for Online Behavioral Advertising).

## Identifying users and user consent

You must not pass any information to Google:

- that Google could use or recognize as personally-identifiable information; or
- that permanently identifies a particular device (such as a mobile phone's unique device identifier if such an identifier cannot be reset).

You must not use Google's platform products to identify users or facilitate the merging of personally-identifiable information with information previously collected as non-personally identifiable information without robust notice of, and the user's prior affirmative (i.e. opt-in) consent to, that identification or merger. Irrespective of users' consent, you must not attempt to disaggregate data that Google reports in aggregate.

[You must comply with the EU user consent policy](#).

## Location data

If in connection with Google's platform products you collect, process or disclose information that identifies or can be used to infer an end user's precise geographic location, such as GPS, wifi or cell tower data:

- you must obtain express (i.e. opt-in) consent from end users;
- all applicable privacy policies must disclose such information collection, processing or disclosure; and
- you will only send such information to Google in an encrypted state or via an encrypted channel.

## Requirements for using uploaded data features

In order to upload data or use certain data features in Google's platform products, your advertising account must have:

- A good history of policy compliance
- A good payment history
- At least 90 days' combined history across Google Ads and/or Display & Video 360
- Combined total of more than USD 50,000 total lifetime spend on Google Ads and/or Display & Video 360. For advertisers whose accounts are managed in currencies other than USD, your spend amount will be converted to USD using the average monthly conversion rate for that currency.

This policy applies to the following features:

- Audience segments imported using a [data management platform](#) (DMP)
- Audience segments from a [third-party data provider](#)
- Audience segments uploaded using [Customer Match](#) (TrueView only)
- Audience segments directly uploaded to Display & Video 360 (for example, [device ID uploads](#))
- Use of [provided lists](#) (uploaded from Campaign Manager) for Display & Video 360 targeting

Learn more about [advertiser uploaded data](#).

*Last updated January 6, 2020.*

See the [platforms program policies update archive](#).



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